

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PETER M. GALLIGAN,

PLAINTIFF

V.

**ADTALEM GLOBAL EDUCATION INC. F/K/A
DEVRY EDUCATION GROUP; ADTALEM
GLOBAL HEALTH, INC. F/K/A DEVRY
MEDICAL INTERNATIONAL, INC.; ROSS
UNIVERSITY SCHOOL OF MEDICINE
SCHOOL OF VETERINARY MEDICINE (ST.
KITTS) LIMITED; AND DOES 1 THROUGH
50,**

DEFENDANTS

[illegible]

CIVIL CASE No. 1:17-cv-06310

JURY TRIAL DEMANDED

**AGREED MOTION CONCERNING BRIEFING DEADLINES
FOR DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S THIRD AMENDED COMPLAINT**

Plaintiff Peter M. Galligan (“Plaintiff”) and Defendants Adtalem Global Education Inc. f/k/a DeVry Education Group, Adtalem Global Health, Inc. f/k/a DeVry Medical International, Inc., and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited (collectively, “Defendants”) file this Agreed Motion Concerning Briefing Deadlines for Defendants’ Motion to Dismiss Plaintiff’s Third Amended Complaint and respectfully request that the Court enter the briefing schedule agreed to by the parties concerning Plaintiff’s brief in response to Defendants’ Motion to Dismiss Plaintiff’s Third Amended Complaint [Dkts. 62-63] and Defendants’ reply brief in support of same.

On March 20, 2019, the parties entered into a briefing schedule for Defendants' then-forthcoming motion to dismiss Plaintiff's Third Amended Complaint, which had

been filed with leave granted by the Court on March 11, 2019. [See Dkts. 58-60]. The Court approved that briefing schedule on March 21, 2019 [see Dkt. 60], and Defendants' filed their motion to dismiss on April 8, 2019 [Dkts. 62-63], in accordance with the agreed briefing schedule.

However, due to extenuating family circumstances experienced by Plaintiff's counsel, the parties have agreed to extend their agreed upon briefing schedule to afford Plaintiff more time to respond to Defendants' motion to dismiss. Specifically, the parties have agreed that Plaintiff shall have until June 5, 2019, to file a response brief and that Defendants shall have until June 21, 2019, to file a reply brief.

Accordingly, the parties respectfully request that the Court grant this Agreed Motion and approve the foregoing briefing schedule for Plaintiff's response brief and Defendants' reply brief.

Dated this 29th day of April, 2019.

Respectfully submitted,

/s/ Michael W. Ford

Michael W. Ford, Esq.
Law Offices of Michael W. Ford
(local counsel)
4 Timberwood Lane
Riverwoods, IL 60015
Telephone: (847) 948-7884
Email: mfordski@gmail.com
IL Bar # 0846139
Member, Trial Bar U.S. District Court N.D. IL

- and -

/s/ Emil T. Bayko

Emil T. Bayko
PORTER HEDGES LLP
1000 Main Street, 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6608
Facsimile: (713) 226-6208
Email: tbayko@porterhedges.com
IL Bar # 0141356

ATTORNEYS FOR PLAINTIFF
PETER M. GALLIGAN

OF COUNSEL:

Kyle Reeb
Texas State Bar No. 24091604
Federal ID No. 2571829
Jim Aycock
Texas State Bar No. 24034309
Federal ID No. 20675
Alison P. Henderson
Texas State Bar No. 24087707
Federal ID No. 2228628
PORTER HEDGES LLP
1000 Main Street, 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Facsimile: (713) 226-6211
kreeb@porterhedges.com
jaycock@porterhedges.com
ahenderson@porterhedges.com

AGREED AS TO FORM AND SUBSTANCE:

By: /s/ Brian Stolzenbach

Brian Stolzenbach

Megan E. Troy

SEYFARTH SHAW LLP

233 S. Wacker Drive, Suite 8000

Chicago, Illinois 60606

Telephone: (312) 460-5000

Facsimile: (312) 460-7000

bstolzenbach@seyfarth.com

mtroy@seyfarth.com

ATTORNEYS FOR DEFENDANTS

ADTALEM GLOBAL EDUCATION INC.,

ADTALEM GLOBAL HEALTH, INC., and

ROSS UNIVERSITY SCHOOL OF MEDICINE

SCHOOL OF VETERINARY MEDICINE (ST. KITTS) LIMITED

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2019, a true and correct copy of the foregoing pleading was electronically filed in accordance with the Federal Rules of Civil Procedure and was served via e-mail upon the following counsel of record:

Brian Stolzenbach
Megan Troy
Thomas M. Horan
SEYFARTH SHAW LLP
233 S. Wacker Drive, Suite 8000
Chicago, IL 60606-6448
(312) 460-5551
bstolzenbach@seyfarth.com
mtroy@seyfarth.com
thoran@seyfarth.com

/s/ Emil T. Bayko

Emil T. Bayko